

# **Exhibit A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ANDREY KOSTIN,  
a/k/a “Andrei Kostin,”

VADIM WOLFSON,  
a/k/a “Vadim Belyaev,” and

GANNON BOND,

Defendants.

S2 24 Cr. 91 (GHW)

**Declaration of  
David R. Felton**

DAVID R. FELTON, pursuant to Title 28, United States Code, Section 1746, declares the following under penalty of perjury:

1. I, David R. Felton, submit this declaration under penalty of perjury.
2. I am an Assistant United States Attorney at the United States Attorney’s Office, Southern District of New York (“USAO-SDNY”).
3. The persons referred to herein and in the accompanying memorandum of law (and the Indictment) as “CC-1,” “CC-2,” and “CC-3” are [REDACTED], respectively.
4. True and accurate copies of FBI FD-302 reports of prior law enforcement interviews of [REDACTED] are attached hereto as Attachments 1, 2, and 3. Specifically: Attachment 1 is a true and accurate copy of an FD-302 report of an interview of [REDACTED] from October 25, 2023; Attachment 2 is a true and accurate copy of an FD-302 report of an interview of [REDACTED] from June 6, 2024; and Attachment 3 is a

true and accurate copy of an FD-302 report of an interview of [REDACTED] from June 6, 2024.

5. Based on my review of the attached FBI FD-302 reports memorializing two prior interviews of [REDACTED] (*i.e.*, Attachments 1 and 2), and [REDACTED]'s counsel's comments to the Government during two phone calls on February 12 and 13, 2025, I expect that [REDACTED] would testify to the following if deposed:

a. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

b. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

c. [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

- d. [REDACTED]  
[REDACTED]  
[REDACTED]

6. Based on my review of the attached FBI FD-302 reports memorializing a prior interview of [REDACTED] (*i.e.*, Attachment 3), and [REDACTED]'s counsel's comments to the Government during two phone calls on February 12 and 13, 2025, I expect that [REDACTED] would testify to the following if deposed:

- a. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

- b. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

- c. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

d. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. On phone calls on February 12 and 13, 2025, counsel to [REDACTED] for the first time informed the Government that they are not willing to travel to the United States to testify at the trial scheduled for June 16, 2025. In response, the Government offered to pay for [REDACTED] travel and lodging expenses and provide a per diem for incidental expenses. Counsel to [REDACTED] reiterated that, notwithstanding the Government's offer to pay for [REDACTED] travel and lodging expenses and provide a per diem, both [REDACTED] remained unwilling to travel to the United States to testify at the trial.
8. Both [REDACTED], however, are willing to subject themselves voluntarily to a deposition in London, United Kingdom.

Dated: March 7, 2025  
New York, New York

*David R. Felton*

---

David R. Felton  
Assistant United States Attorney  
United States Attorney's Office  
Southern District of New York